



October 18, 2018

**VIA ECF E-FILING**

The Honorable Jean K. FitzSimon  
United States Bankruptcy Court  
900 Market Street, Suite 203  
Philadelphia, PA 19107

**RE: In re Jonathan P. Barger**  
**Bankruptcy No: 18-14725-jkf (U.S. Bankruptcy Court for the Eastern District of PA)**

Dear Judge FitzSimon:

Syndcore Holdings, LLC (“Movant”), by and through its undersigned counsel, files this reply in response to the objection of Jonathan Barger (“Debtor”) to the entrance of an Order granting Movant relief from the automatic stay. At a September 26, 2018 hearing, Your Honor directed Debtor to provide proof of insurance on the 2505 Orthodox property at issue here, including verification that the insurance covers hazardous materials on the property. On September 27, 2018, Debtor submitted a certificate of insurance. The certificate had an effective date of September 26, 2018 and did not include proof of hazardous materials coverage. At a hearing on October 10, 2018, Movant submitted a letter from State Farm referencing the fact that certain chemical use would not limit the policy coverage. *See* Debtor’s Ex. B. Your Honor stated that this letter was insufficient and ordered Movant to provide additional evidence of hazardous materials coverage within one week from the hearing. Debtor violated this verbal order by submitting his objection with the same letter and with no additional proof of hazardous materials coverage. At the time of this filing, Movant has received no additional insurance information

whatsoever from Debtor or Debtor's counsel since the time of the hearing over one week ago and respectfully requests that the Court grant relief as specified in the proposed Order.

Please feel free to contact me if you have any questions or need anything further from me at this time. Thank you.

Respectfully,

A handwritten signature in black ink, appearing to read "Jason Rabinovich". The signature is stylized with a large, looped "J" and a cursive "Rabinovich".

Jason Rabinovich, Esq.